

**Resolution Agreement**  
**Institute of Clinical Social Work**  
**OCR Complaint # 05-14-4057**

The Institute of Clinical Social Work (“Institute”) submits the following agreement (“Agreement”) to the U.S. Department of Education, Office for Civil Rights (“OCR”) in resolution of OCR complaint #05-14-4057 (“Complaint”). The Institute submits this Agreement to ensure its compliance with Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. §794. By voluntarily entering into this Agreement with OCR, the Institute admits no wrongdoing and has at no time relevant hereto been subject to a finding of violation by OCR.

The Institute agrees to take the following actions and, upon full compliance with the terms of this Agreement, OCR will close all monitoring of this Agreement and this matter shall be deemed closed:

1. By September 30, 2014, the Institute will revise, and submit to OCR for approval, its notice of nondiscrimination to include a statement specifying the Institute prohibits discrimination on the basis of disability, and include the name and/or title, address, and telephone number of the employee designated to coordinate the Institute’s compliance with Section 504.
2. By September 30, 2014, the Institute will review and revise, and submit to OCR for approval, its academic adjustments policies and procedures to ensure compliance with Section 504 with respect to determining the academic adjustments and auxiliary aids and services to be given to a student with a disability. At a minimum, the policies and procedures will include the following components:
  - a. The determination of all the appropriate academic adjustments and/or auxiliary aids and services for a student with a disability will include input from both the student and the Disability Services Coordinator, in consultation with academic counselors, faculty, and academic administration, as necessary. The Institute may use preprinted forms as a starting point, but must determine appropriate academic adjustments on an individualized case-by-case basis using an interactive process. Determinations as to whether academic adjustments and/or auxiliary aids and services will cause a fundamental alteration to a particular program or course must be made using reasoned deliberation, including a diligent assessment of available options.
  - b. The Disability Services Coordinator will fully document in the student’s case file the date(s) of request(s) for academic adjustments or services, the nature of each request and any supporting documentation, the reason(s) for any denials, and the interactive process that occurred between the Institute and the student. If the Disability Services Coordinator receives a request for academic adjustments or services from a student, the Disability Services Coordinator will contact the student and engage in the interactive process with respect to the request, and will notify the student in writing in a timely manner of all specific academic adjustments or services that have been approved. If a student’s request for

academic adjustments or services is denied, the Disability Services Coordinator will specify the reason for the denial and inform the student of the process that can be used to challenge the denial of such requests.

- c. Faculty will receive notice of the academic adjustments that impact their courses and auxiliary aids and services determined to be necessary for students with disabilities enrolled in their courses. The student and the Disability Services Coordinator will determine who will provide the notice to instructors and the Coordinator will inform the student of who will provide this notice. The procedures will state that if an instructor or the academic administration has any concerns or disagreements with the terms of an academic adjustment and/or auxiliary aids and services, the instructor or academic administration must immediately notify the Disability Services Coordinator. Unless the terms of the academic adjustments and/or auxiliary aids and services are changed, instructors will be expected to comply with the academic adjustments and/or auxiliary aids and services specified.
  - d. The Institute will engage in a deliberative process for determining what course requirements are essential or whether a requested modification would fundamentally alter a course or academic program. This process will include the Disability Services Coordinator, pertinent faculty, and academic administration, as necessary, to make such determinations after a careful, reasoned deliberation that includes a review of program or course requirements. The decisions and reason supporting them will be fully documented by the academic administration.
3. By September 30, 2014, the Institute will adopt, and submit to OCR for approval, grievance procedures that incorporate appropriate due process standards and that expressly provide for the prompt and equitable resolution of complaints alleging any action prohibited by Section 504.
  4. By October 31, 2014, the Institute will provide training to the Disability Services Coordinator and other Institute officials who have responsibility to implement and enforce the policies and procedures and their obligations to comply with Section 504.
  5. By November 30, 2014, after receiving approval from OCR, the Institute will provide notice to all students, faculty and staff of its revised nondiscrimination and academic adjustment policies and grievance procedures. The Institute will also publish the revised policies and procedures on its website and in recruiting materials and other publications, including the Student Manual and Academic Quality Improvement Program Portfolio. The Institute may include appropriate inserts in existing materials and publications until such time when they are reprinted.
  6. By September 30, 2014, the Institute will review the Complainant's program of study for the 2013-2014 school year to determine if Complainant was excluded from any program components and/or prevented from enrolling in any program courses, or enrolled but did not receive credit for any program work, due to her disability. If the Institute determines that Complainant did experience lost educational services, the Institute will design and

implement a program by which Complainant can receive compensatory services for not having received appropriate academic adjustments and/or related aids and services.

7. By October 31, 2014, the Institute shall, in accordance with the revised policies and procedures, invite the Complainant to work with the Disability Services Coordinator in the 2014-2015 school year to determine whether the Complainant is eligible for academic adjustments under Section 504 and, if eligible, ensure that appropriate and effective academic adjustments are provided to the Complainant.
8. By September 30, 2014, the Institute will submit to OCR documentation verifying that it has implemented items 1, 2, 3 and 6 of the Agreement.
9. By October 31, 2014, the Institute will submit to OCR documentation verifying that it has implemented item 4 and 7 of the Agreement.
10. By November 30, 2014, the Institute will submit to OCR documentation verifying that it has implemented item 5 of the Agreement.

The Institute shall provide data and other information in a timely manner. During the monitoring of this Agreement, OCR may visit the Institute, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the Institute has complied with the terms of this Agreement and the provisions of Section 504 applicable to this Complaint review.

The Institute further agrees to comply with the terms of this Agreement until OCR has released it from monitoring. OCR shall promptly close the monitoring when it determines that the Institute has fulfilled the terms of this Agreement and is in compliance with the provisions of Section 504 applicable to the Complaint.

\_\_\_\_\_/s/\_\_\_\_\_  
Dr. Scott Harms Rose  
President and Dean of Students for Institute

\_\_\_\_7-15-14\_\_\_\_  
Date